

ORIGINAL

Mark D. Silverschotz (MDS-8393)

**REED SMITH LLP**

599 Lexington Avenue

29th Floor

New York, NY, 10022

Tel: (212) 521-5400

Fax: (212) 521-5450

Daniel C. Girard

A. J. De Bartolomeo

Jonathon K. Levine (JL-8390)

Aaron M. Sheanin

**GIRARD GIBBS LLP**

601 California Street

14<sup>th</sup> Floor

San Francisco, CA 94108

Tel: (415) 981-4800

Fax: (415) 981-4846

Attorneys for Individual and Representative  
Plaintiff Shary Everett

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SHARY EVERETT, on behalf of herself and all  
others similarly situated,

Plaintiff,

v.

MCI, INC., a Delaware Corporation,

Defendant.

In re:

WORLDCOM, INC., *et al.*,

Debtors.

Adversary Proceeding

No. 07-01792-AJG

Case No. 07-9590 (DC)

Chapter 11

Case No. 02-13533-AJG

(Jointly Administered)

FILED  
U.S. DISTRICT COURT  
2008 FEB 15 AM 10:39  
S.D. OF N.Y.

**NOTICE OF MOTION AND MOTION FOR ADMISSION TO PRACTICE PRO HAC  
VICE OF A. J. De BARTOLOMEO**

2/15/08  
2008  
#7041488

PLEASE TAKE NOTICE that, upon the accompanying Affidavits of Jonathon K. Levine and A. J. De Bartolomeo, dated February 8, 2008, and the exhibits annexed thereto, and upon all prior papers and proceedings, Plaintiff will move this Court on a date to be determined, upon submissions, unless otherwise ordered by the Court, for an Order permitting A. J. De Bartolomeo of Girard Gibbs LLP, counsel for Plaintiff, to practice before this Court in connection with all proceedings in this matter.

Dated: February 11, 2008



JONATHAN K. LEVINE

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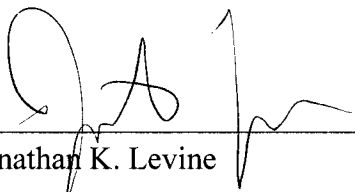
**AFFIDAVIT OF JONATHAN K. LEVINE IN SUPPORT OF PLAINTIFFS' *PRO HAC***  
***VICE* ADMISSION OF A. J. De BARTOLOMEO**

I, Jonathan K. Levine, being duly sworn, deposes and says that the following facts are true and correct to the best of my personal knowledge:

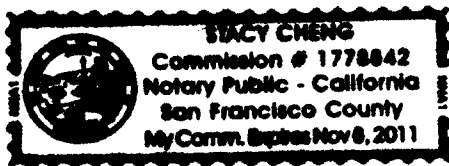
1. I am an attorney duly admitted to practice law before this Court. My admission to this Court was on March 14, 1989.
2. I am not under suspension or disbarment by any court.
3. I am a partner at the firm of Girard Gibbs LLP, and my office is located at 601 California Street, 14<sup>th</sup> Floor, San Francisco, California 94108. My telephone number is (415) 981-4800.
4. I make this affidavit in support of Plaintiffs' Motion for the admission of Aaron M. Sheanin *pro hac vice*.
5. I have known A. J. De Bartolomeo for 7 years, and believe she will uphold the integrity of this Court, and will comply with all applicable New York Local Rules of Civil Procedure.

I declare under penalty of perjury and the law of the United States of America that the foregoing is true and correct. Executed this 11<sup>th</sup> day of February, 2008 at San Francisco, California.

San Francisco, California

  
Jonathan K. Levine

Subscribed and Sworn to me this 11<sup>th</sup> day of February, 2008.



WITNESS my hand and official seal.

  
STACY CHENG

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**AFFIDAVIT OF A. J. De BARTOLOMEO IN SUPPORT OF PLAINTIFFS' *PRO HAC***  
**VICE ADMISSION**

I, A. J. De Bartolomeo, being duly sworn, deposes and says that the following facts are true and correct to the best of my personal knowledge:

1. I am an attorney duly admitted to practice law in the State of California. Attached hereto as **Exhibit A**, is an original Certificate of Good Standing from the State Bar of California.

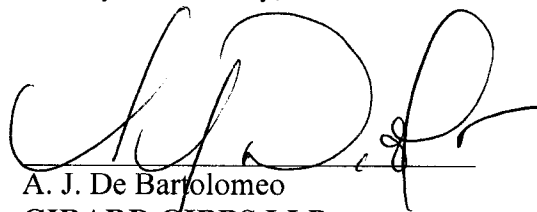
2. I am not under suspension or disbarment by any court.

3. I am a partner at the firm of Girard Gibbs LLP, and my office is located at 601 California Street, 14<sup>th</sup> Floor, San Francisco, California 94108. My telephone number is (415) 981-4800.

4. I make this affidavit in support of Plaintiffs' Motion for my Admission *pro hac vice*.

5. I recognize that if I am admitted *pro hac vice*, I am within the disciplinary jurisdiction of the United States District Court for the Southern District of New York. Upon my admission *pro hac vice*, I agree to comply with all applicable New York Local Rules of Civil Procedure.

I declare under penalty of perjury and the law of the United States of America that the foregoing is true and correct. Executed this 11<sup>th</sup> day of February, 2008 at San Francisco, California.



A. J. De Bartolomeo

**GIRARD GIBBS LLP**

601 California Street, 14<sup>th</sup> Floor

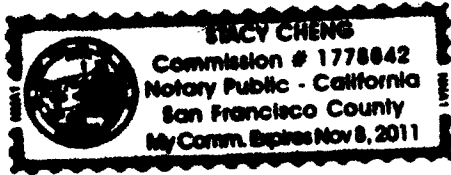
San Francisco, California 94108

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Facsimile: (415) 981-4846

On February 11, 2008, before me, Stacy Cheng, Notary Public, personally appeared A. J. De Bartolomeo, proved by satisfactory evidence to be the person whose name is subscribed to the within instrument and acknowledged to me that she executed the same in her authorized capacity, and that by her signature on the instrument the person, or the entity on behalf of which the person acted, executed the instrument.

WITNESS my hand and office seal.



A handwritten signature in black ink, appearing to be "Stacy Cheng", written over a horizontal line.

**EXHIBIT A**





THE  
STATE BAR  
OF CALIFORNIA

---

180 HOWARD STREET  
SAN FRANCISCO, CALIFORNIA 94105-1639  
TELEPHONE (415) 538-2000

January 23, 2008

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, ANNE MARIE JANINE DE BARTOLOMEO, #136502 was admitted to the practice of law in this state by the Supreme Court of California on December 7, 1988; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Kath Lambert  
Custodian of Membership Records

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**[PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION FOR *PRO HAC VICE*  
ADMISSION OF A. J. De BARTOLOMEO**

GOOD CAUSE SHOWING, and by and through the moving papers of counsel,  
the affidavits filed in support thereof, and no opposition filed by any party;

IT IS HEREBY ORDERED that A. J. De Bartolomeo be admitted before this Court *pro hac vice*, as an attorney for Plaintiffs in this action.

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_, 2008  
New York, New York

\_\_\_\_\_  
HONORABLE DENNY CHIN  
United States District Judge